



Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>

Temujin Cases: Metadata Production

Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>

Wed, Jun 14, 2023 at 2:17 PM

To: Brianna Pierce <bpierce@fnf.law>

Cc: Constantine Economides <ceconomides@fnf.law>, James Cai <jcai@sacattorneys.com>, Jingjing Ye <jye@yefirm.com>

Hi Brianna,

I am following up on my email below and also for a copy of the prior draft of the protective order you referenced. Would you please let us know and send the draft protective order to us at your earliest convenience?

Best regards,
Patrick O'Shaughnessy
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SAC Attorneys LLP

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On Tue, Jun 13, 2023 at 12:07 PM Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com> wrote:

Hi Brianna,

It was nice speaking with you again today. I appreciate you letting us know that Mr. Abittan did receive the metadata our clients produced and that it is ok to send you another set of the production with the metadata to ensure you have it all.

Below please find the list of metadata fields I referenced. Would you please let me know which of these fields are included in the metadata your client plans to produce with responsive documents by marking yes or no next to each field below? Also, would you please add to the list any additional metadata fields in your current set and/or associated with the documents that your client plans to produce (and mark yes or no next to them as applicable)?

1. BEGDOC#
2. ENDDOC#
3. BEGATTACH
4. ENDATTACH
5. CUSTODIAN
6. AUTHOR
7. FROM
8. TO
9. CC
10. BCC

11. FILEEXT
12. DATERCVD
13. TIMERCVD
14. DATESENT
15. TIMESENT
16. DATELASTMOD
17. TIMELASTMOD
18. DATECREATED
19. TIMECREATED
20. TMEZONE
21. SUBJECT
22. Email
23. Subject
24. TITLE
25. FILENAME
26. FILEPATH
27. NATIVEPATH
28. TEXTPATH

Best regards,
Patrick O'Shaughnessy
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